



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

September 5, 2024

BY ECF

The Honorable Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

As stated at the conference on Sept. 6, 2024, on consent of the Defendant, the bail modification request is hereby GRANTED. Defendant is prohibited from employment at Modest Needs.

Dated: September 6, 2024
New York, New York

Re: *United States v. Keith Taylor, 24 Cr. 524 (JLR)*

SO ORDERED.

Jennifer Rochon
JENNIEER L. ROCHON
United States District Judge

Dear Judge Rochon:

The Government writes to respectfully request that the Court make a modification to the conditions of the defendant's release on bail at tomorrow's initial pre-trial conference and arraignment, to prohibit his continued employment at the Modest Needs Foundation ("Modest Needs"), the charity which the defendant founded and from which he is accused of embezzling millions of dollars, as charged in Count One of the Indictment in the above-referenced matter. Pretrial Services concurs in this request.

By way of background, the defendant was arrested on June 11, 2024, after being charged by complaint with wire fraud in violation of 18 U.S.C. § 1343, aggravated identity theft in violation of 18 U.S.C. § 1028A, and six counts of tax evasion in violation of 26 U.S.C. § 7201 ("the Complaint"). At his initial appearance, the Honorable Sarah L. Cave, United States Magistrate Judge for the Southern District of New York, set bail, on consent, of a \$250,000 personal recognizance bond cosigned by one financially responsible person, with additional conditions including a requirement that the defendant remove himself as a signatory on all Modest Needs financial accounts. On September 4, 2024, a grand jury sitting in the Southern District of New York returned an indictment charging the defendant with the same crimes as charged in the Complaint.

The Government understands that the defendant remains employed by Modest Needs. The Charities Bureau of the New York State Office of the Attorney General (the "Charities Bureau") has recently confirmed that Modest Needs had its registration as a charitable organization in New York canceled for failing to file required disclosures, and as such, it is prohibited from soliciting charitable contributions and grants in New York or engaging in any other charitable fundraising activities in New York. Modest Needs' registration status is publicly available on the Charities Bureau's charities database,¹ and the Charities Bureau additionally provided the Government with an image of Modest Needs' registration page, attached as Exhibit A, which reflects that its

¹ Available at: https://www.charitiesnys.com/RegistrySearch/search_charities.jsp

registration is canceled. In light of the charges in this matter and the fact that the charity is no longer permitted to engage in fundraising activities in New York, we request that the Court modify the conditions of the defendant's bail to prohibit the defendant from continuing his employment at Modest Needs.

Pretrial Services agrees that this modification to the defendant's bail is appropriate. The Government has discussed this issue with the defense, and the defense is considering its position.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

/s/ Rebecca R. Delfiner

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cc: Brian Ketcham, Esq. (via ECF)
U.S. Pretrial Services Officer Steve Boose (via email)